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14 *Counsel for Defendants*  
15 *Robert Bosch GmbH and*  
16 *Robert Bosch LLC*

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

*In re: Volkswagen 'Clean Diesel' Marketing,  
Sales Practices, and Products Liability  
Litigation*

This document relates to:

*Iconic Motors, Inc., et al. v. Volkswagen  
Group of America, Inc., et al., No. 3:17-cv-  
3185-CRB*

LEAD CASE No. 15-md-02672-CRB

**DECLARATION OF PATRICK SWIBER  
IN SUPPORT OF BOSCH  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Hon. Charles R. Breyer

1 I, Patrick Swiber, do hereby declare as follows:

2 1. I am an attorney at Cleary Gottlieb Steen & Hamilton LLP, counsel for Robert  
3 Bosch GmbH and Robert Bosch LLC (the “Bosch Defendants”).

4 2. I submit this declaration on behalf of the Bosch Defendants in support of their  
5 Motion for Summary Judgment.

6 3. Attached hereto are true and correct copies of the following documents:

- 7 • Exhibit 1 is ICONIC012271-ICONIC012272.
- 8 • Exhibit 2 is ICONIC011910-ICONIC011912.
- 9 • Exhibit 3 is ICONIC018331-ICONIC018332.
- 10 • Exhibit 4 is Plaintiff Elgin Volkswagen’s Response to Robert Bosch LLC and  
11 Robert Bosch GmbH’s Requests for Admission [].
- 12 • Exhibit 5 is ICONIC013416-ICONIC013417.
- 13 • Exhibit 6 is ICONIC000830-000856.
- 14 • Exhibit 7 is ICONIC000570.
- 15 • Exhibit 8 is a PDF of the report available at the website  
16 <https://www.autonews.com/assets/PDF/CA94261421.PDF> as of September 10,  
17 2024.
- 18 • Exhibit 9 is a PDF of the report available at the website  
19 [https://haigpartners.com/wp-content/uploads/2020/12/HaigReport\\_YE\\_2014.pdf](https://haigpartners.com/wp-content/uploads/2020/12/HaigReport_YE_2014.pdf)  
20 as of September 10, 2024.
- 21 • Exhibit 10 is a PDF of tab 106007 of ICONIC024102, produced by Plaintiffs in  
22 Native format.
- 23 • Exhibit 11 is ICONIC011615- ICONIC011626.
- 24 • Exhibit 12 is ICONIC010983.
- 25 • Exhibit 13 is ICONIC004762-ICONIC004771.
- 26 • Exhibit 14 is ICONIC000191-ICONIC000303.
- 27 • Exhibit 15 is ICONIC000022-000166.
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2 I declare under penalty of perjury that the foregoing is true and correct.

3 Executed on September 11, 2024 in New York, New York.

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